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*Attorneys for Defendants*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SHAWN TALBOT RICE,  
Plaintiff,

v.

LOUIS ERIC JOHNSON, DANIEL  
BOGDEN AND JOHN GREGORY  
DAMM

Defendants.

Case No. 2:21-cv-2112-APG-VCF

**Defendants' Motion for Extension to  
File Reply**

**(First Extension)**

Defendants Louis Eric Johnson, Daniel Bogden, and John Gregory Damm ("Defendants") move for an extension of 21 days to file their reply to Plaintiff's response to Defendants' motion to dismiss. (ECF No. 19). The reply is currently due on March 16, 2022. A 21-day extension would give Defendants until April 6, 2022 to file their reply.

An extension is warranted for several reasons: 1) Defense counsel's office is under a hiring freeze because the nominee for U.S. Attorney in the District of Nevada has not yet been confirmed. 2) Defense counsel's office has been inundated with a higher-than-normal number of immigration cases. The deadlines in those cases are usually shortened and require prompt action, which inhibits defense counsel's ability to focus on her regularly-assigned duties. 3) Defense counsel's office recently lost a number of attorneys and staff. As a result, defense counsel is handling a higher-than-normal caseload. 4) Only a limited number of

attorneys and support staff may work in defense counsel's office at any given time due to the pandemic, thereby slowing the time it takes to process and complete required tasks. 5) Defense counsel's calendar is busier than normal with multiple filing deadlines in several cases, including one before the Ninth Circuit. (Vance Decl ¶ 3). Under the circumstances, good cause exists to extend the deadline for Defendants to file their reply to Plaintiff's response to Defendants' motion to dismiss. *See* Fed. R. Civ. P. 6(b)(1)(A) ("When an act may or must be done within a specified time, the court may, *for good cause*, extend the time...with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires[.]") (emphasis added).

This is Defendants' first request for an extension of time to file their reply brief. *See* LR IA 6-1(a) (must advise of previous extensions). (Vance Decl. ¶ 4). This extension request is made in good faith and not for the purpose of undue delay. (*Id.*).

Respectfully submitted this 15th day of March 2022.

CHRISTOPHER CHIOU  
Acting United States Attorney

s/ Holly A. Vance  
HOLLY A. VANCE  
Assistant United States Attorney

IT IS SO ORDERED:

Dated: March 16, 2022

  
ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE